

Keith J. Miller, Esq.
ROBINSON MILLER LLC
One Newark Center
Newark, New Jersey 07102
(973) 690-5400
kmiller@rwmlegal.com

Walter C. Carlson (admitted *pro hac vice*)
Kristen R. Seeger (admitted *pro hac vice*)
Christopher Y. Lee (admitted *pro hac vice*)
A. Michaela Kabat (admitted *pro hac vice*)
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7000

*Attorneys for Nominal Defendant
Johnson & Johnson*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MARC HIRSCHFELD,

Plaintiff,

vs.

MARY C. BECKERLE, D. SCOTT DAVIS, IAN
E.L. DAVIS, JENNIFER A. DOUDNA, ALEX
GORSKY, MARK B. McCLELLAN, ANNE M.
MULCAHY, WILLIAM D. PEREZ, CHARLES
PRINCE, A. EUGENE WASHINGTON, RONALD
A. WILLIAMS,

Defendants,

and

JOHNSON & JOHNSON,

Nominal Defendant.

CIVIL NO. 3:18-cv-14796 (FLW)

**JOHNSON & JOHNSON'S
NOTICE OF MOTION TO
DISMISS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, on March 18, 2019, the undersigned attorneys for nominal defendant Johnson & Johnson shall move for an Order dismissing the Complaint.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying brief, Declaration of Debra Wong Yang, and Certification of Keith J. Miller in support of the motion. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: February 20, 2019

Walter C. Carlson
Kristen R. Seeger
Christopher Y. Lee
A. Michaela Kabat
Sidley Austin LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7000

Respectfully Submitted,

/s/ Keith J. Miller
Keith J. Miller, Esq.
Robinson Miller LLC
One Newark Center
Newark, New Jersey 07102
(973) 690-5400
kmiller@rwmlegal.com

*Attorneys for Nominal Defendant
Johnson & Johnson*

CERTIFICATION OF SERVICE

I certify that on February 20, 2019, I caused a copy of the attached Notice of Motion and the documents referenced therein to be served on counsel of record via the Court's electronic filing system.

/s/ Keith J. Miller